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8 *Proposed Attorneys for Debtor, Xtreme Green Products, Inc.*

9 **UNITED STATES BANKRUPTCY COURT**
10 **FOR THE DISTRICT OF NEVADA**

11 In re:

BK-S-13-17266-MKN

12 Xtreme Green Products, Inc.,

Chapter 11

13 Debtor.

**DECLARATION OF NEIL ROTH IN SUPPORT
OF EX PARTE APPLICATION FOR ORDER
SHORTENING TIME TO HEAR (1) MOTION
FOR INTERIM ORDER AND FINAL ORDER
AUTHORIZING POST-PETITION
FINANCING AS A PRIORITY
ADMINISTRATIVE EXPENSE AND A
SECURED LOAN PURSUANT TO 11 U.S.C. §
364(c); AND (2) MOTION FOR ORDER
AUTHORIZING THE PAYMENT OF
PREPETITION CLAIMS OF CRITICAL
VENDORS**

Hearing Date: OST REQUESTED

Hearing Time: OST REQUESTED

14 Neil Roth, president of Xtreme Green Products, Inc. (the “Debtor” and “Debtor In
15 Possession”), under penalties of perjury, hereby declares:

16 1. *A Motion For Interim And Final Order Authorizing Post-petition Financing As A*
17 *Priority Administrative Expense And A Secured Loan Pursuant To 11. U.S.C. § 364(c)* (the “DIP
18 Financing Motion”) has been filed. In this DIP Financing Motion, the Debtor requests an order
19 approving and permitting immediate disbursement of the interim financing in the amount of
20 \$650,000, and the setting of a final hearing for this Court to approve the total DIP Loan up to
21 \$2,000,000.


4. Pre-petition, the Debtor ceased operations.

6. The restarting of production, the timely fulfillment of the existing orders and the payment of fees for certain upcoming exhibitions is critical to the Debtor's plan to reorganize its operations.

8. Notice can be shortened pursuant to Bankruptcy Rule 9006(c)(1) and LR 9006(a).

9. Debtor requests that the two Motions be heard on shortened time to prevent the disruption of the Debtor's daily operation of its business.

Dated this 22 day of August, 2013.


Neil Roth